

EXHIBIT A

Plaintiffs' and Defendants' Proposed Case Schedules

N.Z., et al. v. Fenix International Limited, et al.

Central District of California, Case No. 8:24-cv-01655-FWS-SSC

Event	Plaintiffs' Proposed Dates	Defendants' Proposed Dates
Motions to Dismiss	Motion: 30 days after Plaintiffs file an amended complaint, or 14 days after Plaintiffs notify Defendants they do not intend to amend their complaint, per Court's October 28 Order Sequencing Dispositive Motions, ECF No. 68 ("October 28 Order"). Responses: 35 days after motion Reply: 28 days after response	
Start of discovery	03/13/2025	06/05/2025
Initial Disclosure Deadline	03/13/2025	07/05/2025
Deadline to file Motion to Amend Pleadings/Add Parties	Motion: 08/05/2025 Responses: 09/02/2025 Reply: 09/23/2025	Motion: 08/05/2025 Responses: 09/02/2025 Reply: 09/23/2025 Note: This does not affect the schedule found in the Court's October 28 Order.
Last day to hear Motion to Amend Pleadings/Add Parties	10/23/2025	10/23/2025
Class Certification Expert Disclosures, including service of expert reports if required	Initial: 02/05/2026 Rebuttal: 03/19/2026	Initial: 02/05/2026 Rebuttal: 03/19/2026
Class Certification Expert Discovery Cutoff	05/04/2026	05/04/2026

Class Certification Motion	Motion: 06/04/2026 Response: 07/09/2026 Reply: 08/06/2026	Motion: 06/04/2026 Response: 07/09/2026 Reply: 08/06/2026
Last day to hear Class Certification Motion	09/03/2026	09/03/2026
Fact Discovery Cutoff	02/18/2027	11/12/2026
Expert Disclosures, including service of expert reports if required	Initial: 11/19/2026 Rebuttal: 01/07/2027	Initial: 11/19/2026 Rebuttal: 01/07/2027
Expert Discovery Cutoff	02/18/2027	02/18/2027
Dispositive and <i>Daubert</i> Motion Deadlines	Motion: 03/04/2027 Response: 04/08/2027 Reply: 05/06/2027	Motion: 03/04/2027 Response: 04/08/2027 Reply: 05/06/2027
ADR Deadline	05/20/2027	05/20/2027
Last day to hear Dispositive and <i>Daubert</i> Motions	05/27/2027	05/27/2027
Trial Filings (first round)	07/29/2027	07/29/2027
Trial Filings (second round)	09/02/2027	09/02/2027
Pretrial Conference	09/16/2027	09/16/2027
Trial	10/05/2027	10/26/2027